

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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AMERICAN CIVIL LIBERTIES UNION OF )  
MASSACHUSETTS and LAWYERS FOR )  
CIVIL RIGHTS, )  
Plaintiffs, )  
v. ) C.A. No. 19-12564-MBB  
UNITED STATES DEPARTMENT OF )  
HOMELAND SECURITY, IMMIGRATION )  
AND CUSTOMS ENFORCEMENT, )  
Defendants. )  
)

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**JOINT STATUS REPORT**

The government completed its production on March 15, 2021. The parties are in the process of meeting and conferring and believe that we can significantly narrow the scope of the issues on summary judgment. The parties request a modest extension of the current summary judgment briefing schedule to do so. A proposed order outlining the prior and amended, proposed deadlines is attached as **Exhibit A**.

Date: April 4, 2021

Respectfully Submitted,

/s/ Lauren Godles Milgroom

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing will be filed through the electronic filing system of the Court, which system will serve counsel of record, on April 4, 2021.

*/s/ Lauren Godles Milgroom*  
Lauren Godles Milgroom